

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH CAROLINA
FLORENCE DIVISION

Stacy Langsdorf,

Plaintiff,

vs.

Columbia Sussex Management, LLC and
Columbia Properties Myrtle Beach, LLC,

Defendants.

Civil Action No.:

NOTICE OF REMOVAL

Defendant Columbia Sussex Management, LLC and Defendant Columbia Properties Myrtle Beach, LLC (collectively “Defendants”), through its counsel Christian Stegmaier and Laura R. Baer of Collins & Lacy, P.C., file this Notice of Removal in the above-captioned case to the United States District Court for the District of South Carolina, Florence Division, pursuant to 28 U.S.C. §§ 1332, 1441, and 1446.

Defendants would respectfully show unto this Honorable Court:

1. The above-entitled action was brought in the Horry County Court of Common Pleas by Plaintiff to recover from Defendants a judgment for actual and punitive damages for injuries that could be characterized as substantial, together with the cost and fees of this action. By virtue of these allegations, Defendants aver the jurisdictional threshold has been satisfied.
2. Plaintiff’s Amended Complaint is silent as to the amount in controversy. Although the Amended Complaint does not specify the amount of damages sustained or pray for a specific sum, Plaintiff alleges that “as a direct and proximate cause” of the incident alleged in her Amended Complaint, she has suffered “severe left wrist injury, lacerations and

bruising, all of which required immediate medical attention and subsequently, continued medical treatment” (Amd. Compl. at ¶ 11), from which she has incurred “physical pain, suffering, mental anguish, emotional distress, lost wages, permanent impairment of health and/or bodily efficiency, loss of enjoyment of life, loss of sleep, loss of ability to adequately concentrate, increased susceptibility to future injury, substantial expenses incurred in provision of reasonable and necessary medical services, expenses incurred in transportation to and from provides of reasonable and necessary medical services and such other and/or further such particulars as may be learned through discovery, trial or otherwise.” (Amd. Compl. at ¶ 23).

3. Counsel for Defendants consulted with Plaintiff’s counsel regarding the extent of Plaintiff’s damages and further understand that Plaintiff’s claims may include expenses related to medical treatment and a series of injections, future surgical intervention, and substantial lost wages.
4. Counsel for Defendants prepared a stipulation as to damages for Plaintiff’s review and consideration and has not received the same back from Plaintiff or any indication of an intent to agree to the same.
5. Based upon the above, Defendants submit there is sufficient evidence that the amount in controversy exceeds the jurisdictional threshold for removal.
6. Counsel for Defendants’ accepted service of the Amended Summons and Amended Complaint on February 8, 2021. The deadline to remove this matter is March 10, 2021.
7. Defendant Columbia Sussex Management, LLC, is a limited liability corporation organized and existing under the laws of the State of Kentucky and maintains servants, agents, and employees in, and doing business in Horry County, South Carolina. The members of

Columbia Sussex Management, LLC, are citizens and residents of a state other than South Carolina.

8. Defendant Columbia Properties Myrtle Beach, LLC, is a limited liability corporation organized and existing under the laws of the State of Delaware and maintains servants, agents, and employees in, and doing business in Horry County, South Carolina. The members of Columbia Properties Myrtle Beach, LLC, are citizens and residents of a state other than South Carolina.
9. Plaintiff avers in her Amended Complaint that she is a citizen and resident of New York.
10. Defendants file herewith copies of all process, pleadings, and orders heretofore served upon them or entered in this action as part of this notice.
11. Defendants will file a copy of this Notice of Removal with the Clerk of Court for Horry County, South Carolina, and will serve a copy upon counsel for Plaintiff.

WHEREFORE, Defendants Columbia Sussex Management, LLC, and Columbia Properties Myrtle Beach, LLC, pray this Honorable Court accept this Notice of Removal that is being filed and that this Honorable Court take jurisdiction of the above-entitled case and all further proceedings in said cause in the Court of Common Pleas, County of Horry, State of South Carolina be stayed.

[SIGNATURES ON FOLLOWING PAGE]

Respectfully submitted,
COLLINS & LACY, P.C.

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LLC AND COLUMBIA PROPERTIES
MYRTLE BEACH, LLC

NOTICE OF REMOVAL

March 5, 2021
Columbia, South Carolina